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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Cox Airparts LLC, a Kansas limited
liability company;

Plaintiff,

v.

Bruce Brown, in his individual capacity
d/b/a Arizona Aircraft Accessories; Kevin
Brown, in his individual capacity, d/b/a
Arizona Aircraft Accessories; Arizona
Aircraft Accessories LLC, Michael Polve,
in his individual capacity, and MJP
Services, LLC, an Arizona Limited
Liability Company; Warrior Enterprises,
Inc.,

Defendants.

Case No.: CV-21-2213-PHX-SRB

Status Report

Honorable Susan R Bolton

1 Plaintiff Cox Airparts, LLC, (“Plaintiff” or “Cox Airparts”) responds to the
2 Court Order (DOC08) requiring a status report of the case.

3
4 ***Defendants Bruce Brown and Warrior Enterprises, Inc.***

5 Plaintiff moved for Entry of Default as to Defendants Bruce Brown and
6 Warrior Enterprises, Inc. (DOC09) on February 24, 2022, and the Clerk entered the
7 default of both defendants on February 25, 2022 (DOC010). On February 25, 2022,
8 Bruce Brown called Plaintiff’s counsel and informed him that he had retained counsel
9 and would be filing for bankruptcy, however, Bruce Brown’s counsel has not yet
10 contacted Plaintiff’s counsel.

11
12 ***Defendants Kevin Brown, AAA LLC, Michael Polve, and MJP Services, Inc.***

13 Defendants Kevin Brown, Arizona Aircraft Accessories (AAA), LLC, Michael
14 Polve, and MJP Services, Inc., were served by First Class U.S. Mail on March 2,
15 2022, as authorized by the Court in its order filed March 1, 2022 (DOC 011). A
16 Notice of Evidence of Mailing has been filed with the Court (DOC 012). Plaintiff
17 also served AAA, LLC, on February 25, 2022, by depositing two copies of the
18 summons, Complaint, and Declaration of Richard Cox in support of the Complaint as
19 allowed under Ariz. R. Civ. P. 4.1.

20
21 ***Possible Default Judgment against Bruce Brown and Warrior Enterprises, Inc.,***

22 Plaintiff suggests that a motion for default judgment against defaulted Defendants
23 Bruce Brown and Warrior Enterprises, Inc., may be premature as a default against
24 said defendants may be impacted depending on the action of the remaining
25 defendants, which for the time being remain unresolved. Plaintiff’s Complaint alleges
26 the Defendants acted jointly and severally to breach, or as the litigation pertains to
27 Defendants Michael Polve and MJP Services, Inc., acted to *aid* the Brown Defendants
28 in the breach of, several agreements between the parties. Accordingly, it is possible

that any one or more of Defendants Kevin Brown, AAA, LLC, Michael Polve, and/or MJP Services, LLC, may appear and file a responsive pleading including defenses or counterclaims that may affect the liability of defaulted Defendant Bruce Brown or the measure of damages for which he is responsible. Accordingly, Plaintiff suggests that there is just reason for delaying the filing of a motion for default judgment against Bruce Brown, at least until the time to file a responsive pleading by Defendants Kevin Brown and Michael Polve expires.

Dated March 3, 2022

Venjuris, P.C.

By /s/ Michael F. Campillo
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CERTIFICATE OF SERVICE

☐ I hereby certify that on March 3, 2022, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Name	Email Address

☒ I hereby certify that on March 3, 2022, I served the attached document by First Class U.S. Mail or email on the following, who are not registered participants of the CM/ECF System:

Name	Physical or Email Address
Bruce Brown	1917 S Sabrina, Mesa AZ 85209

	brucebrown1374@icloud.com bruceb@arizonaaircraft.com
Kevin Brown, individually and for Arizona Aircraft Accessories, LLC	662 W Aster Ct, Chandler, AZ 85248 kevin@azaircraftparts.com
Michael Polve, individually and for MJP Services, LLC	11261 E Stearn Ave, Mesa AZ 85212 michaelpolve@hotmail.com

s/ Michael F. Campillo